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To: The Honorable Judge Pamela K. Chen, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Via: Electronic Filing
Date: April 9, 2019

Re: Richard K. Lai – 17-CR-224

Dear Judge Chen:

This is a travel request identical to one made by Mr. Lai in March of 2018 that had been previously approved by your Honor.

The Court recalls that Mr. Lai had made a request to travel to the Republic of Palau with his brothers; a trip they had made for almost the last 30 years. The trips together had been termed “brother bonding” trips. And as before, they are personal ones. This year, it has been planned from April 23, 2019 to April 30, 2019. Mr. Lai requests that his release order be amended to include again travel to Palau in April of this year.

As always, Mr. Lai, prior to travel to the Republic, will request permission from Pretrial Services to travel there and retrieve his passport for the purpose stated above. Upon his return, Mr. Lai will return it to Pretrial Services. He understands that this request does not mean he is able to travel freely to the Republic of Palau any time after April 30, 2019 without permission of the Court or Pretrial Services.

Mr. Lai has amply demonstrated he is not a flight risk. He has deep personal and professional roots in Guam with no incentive to violate his conditions. He signed an appearance bond of \$1,000,000.00 which is secured by property in Irvine, California for which he executed a confession of judgment. His several trips and returns provides ample evidence to show this Court his sincerity in following its orders. He has fulfilled most, if not all, of his conditions of his plea. He remains committed to fulfilling his end of the bargain with the USAO EDNY.

The USAO EDNY has consented to the requested modification for travel. I humbly await your decision.

Respectfully submitted,



LEONARDO M. RAPADAS